

reduction in the average rate paid for CenturyLink enterprise broadband services that were detariffed in 2007 and 2008. On average, the average rate for CenturyLink services covered by the *Enterprise Broadband Forbearance Orders* have declined by [BEGIN HIGHLY CONFIDENTIAL] ■ [END HIGHLY CONFIDENTIAL] percent since they were detariffed. The prices for some individual services have dropped even further. For example, the average price paid for Embarq's Ethernet-based EPL service has declined by [BEGIN HIGHLY CONFIDENTIAL] ■ [END HIGHLY CONFIDENTIAL] percent since 2007.

28. The requested forbearance will further benefit customers. With its enterprise broadband services uniformly regulated as nondominant services, CenturyLink will be able to develop company-wide offerings at uniform rates, terms and conditions, as demanded by customers. CenturyLink also will be more aggressive in attempting to match and beat competitors' promotional offerings on a transaction-by-transaction basis—resulting in lower prices and more satisfied customers.

/s/ Emily Binder
Emily Binder

February 23, 2012

Attachment E

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National and Regional Providers of Enterprise Broadband Services

Above Net. AboveNet Inc. is a facilities-based provider of high bandwidth services in 20 U.S. markets. Its services include Metro Area Networks, Wide Area Networks, WDM Wavelength Services, Metro Ethernet, WAN Ethernet and IP Transit.¹

American Telesis. American Telesis “provides Wide Area Network solutions utilizing a Complete Suite of Data and IP Products, including Private Lines, Ethernet Private Lines, MPLS/IPVPN, Dedicated Internet Access, Frame Relay and Managed Services.”² It can provide Ethernet Private Line service “at speeds ranging from 1.5Mb to 10Gb, from New England to California or anywhere in between.”³ These services “are not limited to fiber lit buildings, but instead can be delivered over existing copper facilities, opening up the networking possibilities of all customer sites.”⁴

AT&T. AT&T is one of the leading worldwide providers of IP-based communications services to businesses.⁵ “AT&T Business Solutions serves nearly **3.9 million business customers** – ranging from the largest global companies to medium and small businesses.”⁶ It serves all of the Fortune 1000 companies.⁷ AT&T is also a global leader in providing wholesale services to carriers, wireless service providers, cable providers, system integrators, Internet service providers and content providers.⁸

Bright House. Bright House Networks offers a variety of facilities-based enterprise broadband services, including Metro Ethernet services, with connection speeds up to 1 Gbps, as well as Managed VPN.⁹ Bright House serves customers in Tampa Bay and Orlando, FL; Bakersfield, CA, Indianapolis, IN; Detroit, MI; and Birmingham, AL, along with several other smaller regions in Alabama and the Florida Panhandle.¹⁰

¹ AboveNet website, available at <http://www.above.net/about/>.

² American Telesis website, available at http://www.american-telecom.net/about_us.html.

³ American Telesis website, available at <http://www.american-telecom.net/ethernet.html>.

⁴ American Telesis website, available at <http://www.american-telecom.net/ethernet.html>.

⁵ AT&T website, available at <http://www.att.com/gen/investor-relations?pid=5711>.

⁶ AT&T website, available at <http://www.att.com/gen/press-room?pid=21436>.

⁷ AT&T website, available at <http://www.att.com/gen/press-room?pid=21436>.

⁸ AT&T website, available at <http://www.att.com/gen/investor-relations?pid=5711>.

⁹ Bright House website, available at
http://business.brighthouse.com/Data_and_Internet/Dedicated_Internet_Access/;
http://business.brighthouse.com/data_and_internet/metro_ethernet/;
http://business.brighthouse.com/data_and_internet/managed_vpn/.

¹⁰ Bright House website, available at <http://brighthouse.com/corporate/about/service-areas>.

BT Americas. BT Americas, a subsidiary of BT Group, owns and operates its own network infrastructure in North America, including a reach to all major U.S. cities.¹¹ It offers in 28 countries (including the United States) “a new **E-LAN** service, dramatically increasing flexibility for organizations with ambitions to use Ethernet ‘any to any’ connectivity between sites”¹² BT serves more than 10,000 corporate customers globally including 75 percent of the Fortune 500 and more than half of the Fortune 1000.¹³

Charter. Charter Communications is the fourth-largest cable operator in the United States, serving approximately 5.2 million customers in 25 states.¹⁴ It also provides a variety of enterprise broadband services. Charter Business Fiber Internet offers businesses “symmetrical access service with speeds from 2 Mbps up to 1 Gbps, with the ability to scale in increments of as little as 1 Mbps.” Delivered via a direct fiber-optic connection, this Ethernet-based service can seamlessly interface with the customer’s office local area network.¹⁵ Charter’s Data Networking services connect two or more locations in either point-to-point, point-to-multipoint or any-to-any (mesh) configurations through a redundant, reliable network, with speeds ranging from 10 Mbps to 10Gbps.¹⁶

Cogent. Cogent Communications is a multinational Tier 1 Internet Service Provider with over 54,500 route miles of intercity fiber and more than 16,600 metro fiber miles, providing service to over 170 major markets and interconnecting with over 3,800 other networks.¹⁷ Its enterprise broadband services include IP Transit and Ethernet Point to Point, at speeds up to multiple Gbps.¹⁸

Comcast. Comcast’s “vast and constantly growing footprint spans 29 regional networks in 39 states and includes . . . more than 145,000 miles of fiber.”¹⁹ Examples of Comcast’s enterprise broadband services include Ethernet Private Line, Ethernet Virtual Private Line (EVPL) and Ethernet Dedicated Internet services, with speeds ranging from 1 Mbps to 10 Gbps.²⁰ EVPL “is an ideal replacement for frame relay or ATM services.”²¹

¹¹ BT Americas website, available at <http://www.btamericascareers.com/about/>.

¹² PR Newswire, *BT Connect – New Ethernet Connect Services Improving Freedom To Innovate* (Nov. 17, 2011), available at <http://www.prnewswire.com/news-releases/bt-connect---new-ethernet-connect-services-improving-freedom-to-innovate-134030733.html>.

¹³ BT Americas, available at http://www.btamericascareers.com/about/did_you_know/.

¹⁴ Charter website, available at <http://www.charter.com/about>.

¹⁵ Charter website, available at <http://www.charterbusiness.com/fiber-internet.aspx?type=ps>.

¹⁶ Charter website, available at <http://www.charterbusiness.com/data-networking.aspx>.

¹⁷ Cogent website, available at <http://www.cogentco.com/en/about-cogent>.

¹⁸ Cogent website, available at <http://www.cogentco.com/en/products-and-services>;
<http://www.cogentco.com/en/products-and-services/ethernet-point-to-point>.

¹⁹ Comcast website, available at <http://business.comcast.com/enterprise/about-us/our-network>.

²⁰ Comcast website, available at <http://business.comcast.com/enterprise/services>.

²¹ Comcast website, available at <http://business.comcast.com/enterprise/services/Data/ethernet-virtual-private-line>.

Cox. Cox Business is the business-to-business division of Cox Communications, Inc., the third largest cable provider in the nation and seventh largest telephone company with more than 6 million customers.²² Cox Business is a facilities-based provider of advanced voice, data and video products and services to more than 250,000 business customers in industries ranging from healthcare and hospitality to government and education. It operates a “self-owned and self-maintained nationwide IP network.”²³ Cox offers a full suite of voice, data and video services for small, medium and large businesses as well as for government and education in more than 25 markets, from California to New England.²⁴ Its enterprise broadband services include Metro Ethernet and Private Line services, with speeds up to 9.6 Gbps.²⁵

DukeNet. DukeNet Communications develops and manages fiber optic communications systems, primarily in the southeastern U.S. DukeNet controls more than 5,300 miles of fiber optic network and offers a range of solutions to meet wholesale and enterprise customers’ bandwidth needs.²⁶ DukeNet has combined optical fiber and FCC licensed microwave to create the maximum in digital IP capacity and speed to connect all of customer locations, no matter if they are urban, suburban or rural. This hybrid network allows DukeNet to reach locations that otherwise might not be cost effective or reachable.²⁷

EarthLink. EarthLink, Inc. “operates an extensive network including 28,000 route fiber miles, 90 metro fiber rings and 4 secure data centers providing ubiquitous IP coverage across more than 90 percent of the country.”²⁸ EarthLink Business provides communications solutions to over 150,000 business customers, with specialized applications for many industries including retail, healthcare, transportation, financial institutions and governments.²⁹ Its MPLS over Ethernet service works as a reliable backbone for large networks with substantial traffic demands, and its Private Line service offers high-speed connections including OCn.³⁰ EarthLink has recently expanded its network to include “major transport network builds, new OC-192 10 Gigabit Ethernet fiber rings, additional high-speed access points for private Voice over IP network traffic, nationwide IP MPLS and EVDO wireless network expansions, and . . . high-capacity fiber rings” for “EarthLink’s enterprise class data centers.”³¹

Edison. Edison Carrier Solutions, a business unit of Southern California Edison, is a CLEC focused on the wholesale carrier and large business market, offering high capacity services at

²² Cox website, available at <http://www.coxbusiness.com/aboutus/index.html>.

²³ Cox website, available at <http://www.coxbusiness.com/aboutus/index.html>.

²⁴ Cox website, available at <http://www.coxbusiness.com/aboutus/index.html>.

²⁵ Cox website, available at <http://ww2.cox.com/business/arizona/data/business-internet.cox>.

²⁶ DukeNet website, available at <http://dukenet.com/>.

²⁷ DukeNet website, available at <http://dukenet.com/hybrid-fiber-microwave.asp>.

²⁸ EarthLink website, available at <http://www.earthlink.net/about/corp/>.

²⁹ EarthLink website, available at <http://www.earthlinkbusiness.com/solutions/enterprise.xea>.

³⁰ EarthLink website, available at <http://www.earthlinkbusiness.com/products/mpls.xea>.

³¹ EarthLink, Press Release, *EarthLink Announces Network Expansion and Enhancements for Scalability and Growth* (Oct. 17, 2011), available at <http://www.earthlink.net/about/press/pressrelease.faces?id=873>.

DS3 and above.³² Its services include SONET, Managed Wavelength, Dark Fiber and Cell Site Backhaul.³³ It has one of the largest competitive carrier fiber-optic networks in Southern California.³⁴

FiberLight. FiberLight is a provider of networking services including Ethernet, Wavelengths and IP, SONET and Dark Fiber optical transport network solutions. FiberLight “wholly owns its 500,000 fiber-mile network in key growth areas and offers robust metro networks in 23 metros within Georgia, Florida, Washington, D.C., Texas, Virginia and Maryland.”³⁵ It offers “best in breed Carrier Ethernet technology on a \$1 billion diversely constructed optical ring topology network.”³⁶

FiberTech. FiberTech Networks is “a leader in building and operating fiber networks throughout mid-size cities in the Eastern and Central regions of the United States. The company has built metro-area networks strategically connecting local Telco central offices, carrier hotels, data centers, office parks and other high traffic locations.”³⁷ The company has core networks operations in more than 24 cities. It serves “major long distance, CLEC, ISP and wireless carriers,” as well as “*Fortune 500* companies, large financial institutions, major healthcare facilities, well known universities, K-12 school districts, along with many mid-size companies in very diverse industries[.]”³⁸ FiberTech’s enterprise solutions include private line services up to OC-192 in capacity and Ethernet from 3 Mbps to 10 Gbps.³⁹

FPL FiberNet. FPL FiberNet, a subsidiary of NextEra Energy, Inc., offers a full range of transport services to meet the needs of telecommunications companies, wireless providers, CLECs, ISPs, enterprises and institutions in the southeastern U.S.⁴⁰ These services include Ethernet VPN and fiber-optic broadband services, with speeds ranging from 10 Mbps to 40 Gbps.⁴¹

³² Edison Carrier Solutions website, available at <http://www.edisonconnect.com/home/default.asp>.

³³ Edison Carrier Solutions website, available at <http://www.edisonconnect.com/wireline/default.asp>.

³⁴ Edison Carrier Solutions website, available at <http://www.edisonconnect.com/aboutus/default.asp>.

³⁵ FiberLight Press Release, *FiberLight Secures Anchor Wins: Construction Underway on More than 3,000 Miles of New Fiber in Texas* (Feb. 14, 2012), available at <http://www.fiberlight.com/fiberlight-secures-anchor-wins-construction-underway-on-more-than-3000-miles-of-new-fiber-in-texas/>.

³⁶ FiberLight website, available at <http://www.fiberlight.com/>.

³⁷ FiberTech website, available at <http://www.fibertech.com/about-fibertech/fact-sheet/>.

³⁸ FiberTech website, available at <http://www.fibertech.com/about-fibertech/fact-sheet/>.

³⁹ FiberTech website, available at <http://www.fibertech.com/enterprise/>.

⁴⁰ FPL FiberNet website, available at <http://www.fplfibernet.com/about/contents/index.shtml>; <http://www.fplfibernet.com/about/contents/overview.shtml>.

⁴¹ FPL FiberNet website, available at <http://www.fplfibernet.com/prodserv/ethernet.shtml>; <http://www.fplfibernet.com/prodserv/wave.shtml>.

Frontier. Frontier Communications is the nation's largest communications services provider focused on rural areas and small and medium-sized towns and cities in 27 states, and the nation's fifth largest Incumbent Local Exchange Carrier (ILEC), with approximately 5.7 million access lines and 1.7 million broadband connections.⁴² Frontier's commercial and carrier services include Metro Ethernet; Dedicated Internet; Internet Protocol, optical, Multiprotocol Label Switching (MPLS), and TDM data transport services.⁴³

Integra. Integra Telecom provides enterprise-grade networking, communications and cloud solutions to over 100,000 business and carrier customers in 200 business communities in 11 Western states.⁴⁴ The company "owns and operates a nationally acclaimed, best-in-class fiber-optic network consisting of a 5,000-mile high-speed long-haul fiber network and a 3,000-mile metropolitan access network including nearly 1,700 fiber-fed buildings."⁴⁵ Integra's services include Business Connect Ethernet Bundles, which feature Ethernet data services with 1.5Mbps to 30 Mbps of symmetrical upstream and downstream bandwidth, as well as various private networking services with bandwidth up to 10Gbps.⁴⁶

Level 3. Level 3 is a facility-based provider of a broad range of communications services, including metropolitan and intercity wavelengths, private line, Ethernet private line, high speed IP service, ATM, Frame Relay and VPN services.⁴⁷ Level 3's Tower Access services provide the capability to provide carrier-neutral towers on or near existing network facilities to enable wireless providers to expand their wireless network "without the expense of costly fiber builds or dedicated tower access."⁴⁸ Level 3 owns or controls fiber networks in about 125 cities, with more than 100,000 buildings within 500 feet of its network.⁴⁹ With the

⁴² Frontier Form 10K for the year ended December 31, 2010, available at <http://phx.corporate-ir.net/phoenix.zhtml?c=66508&p=irol-SECText&TEXT=aHR0cDovL2lyLmludC53ZXN0bGF3YnVzaW5lc3MuY29tL2RvY3VtZW50L3YxLzAwMDAwMjA1MjAtMTEtMDAwMDEwL3htbA%3d%3d> at 2 (Frontier 2010 10K).

⁴³ Frontier 2010 10K at 6.

⁴⁴ http://www.integratelecom.com/about/company_information.php; Integra, Press Release, *Network-Wide Availability of Managed and Hosted Network Services* (Dec. 6, 2011), available at http://www.integratelecom.com/about/news/press_release_articles/2011_12_06_Integra_PBX_Services.pdf (Integra Press Release).

⁴⁵ Integra Press Release at 1.

⁴⁶ Integra website, available at http://www.integratelecom.com/services/business_connect.php; http://www.integratelecom.com/services/Ethernet_Services.php; http://www.integratelecom.com/services/High_Speed_Internet.php.

⁴⁷ Level 3 2010 10K, available at http://files.shareholder.com/downloads/LVLT/1608183850x0x457760/8BA2D7DD-415D-4257-8613-83809B713C42/2010_Annual_Report-Proxy.pdf at FR 5 (Level 3 2010 10K).

⁴⁸ Level 3 website, available at <http://www.level3.com/en/products-and-services/data-and-internet/rural-access-solutions/tower-access/>.

⁴⁹ Level 3 2010 10K at 3.

acquisition of Global Crossing, Level 3 provides service over 165,000 intercity, metro and subsea fiber route miles with a presence in 45 countries.⁵⁰

Lighttower. Lighttower Fiber Networks “is the premier metro fiber and bandwidth service provider in the Northeast, offering customized all-fiber networking solutions.”⁵¹ It offers a “state-of-the-art, all-fiber network with unparalleled reliability and density throughout New England, Metro New York, Long Island, New Jersey, and the Hudson Valley.”⁵² Lighttower’s services include Ethernet, Dark Fiber, Wavelengths and SONET.⁵³

Lumos Networks. Lumos Networks (formerly a subsidiary of NTELOS) is a fiber-based service provider in the Mid-Atlantic region. Its product offerings include high-speed transport, wavelengths and Metro Ethernet. Its products are supported by approximately 5,800 fiber route miles in Virginia, West Virginia and portions of Pennsylvania, Maryland, Ohio and Kentucky.⁵⁴ It provides Ethernet connectivity from 1.5 Mbps to 1 Gbps.⁵⁵

Masergy. Masergy Communications “provides managed, secure virtualized network services to enterprises that have complex needs across multiple locations.”⁵⁶ Masergy serves customers throughout the Americas, Europe, Asia, Africa and Australia.⁵⁷ Its Intelligent Transport “delivers the convenience of Ethernet anywhere in the world” at port speeds of 1.5 Mbps to Gigabit.⁵⁸

MegaPath. In 2010, three national brands—Covad Communications, Speakeasy and MegaPath—came together to form the new MegaPath.⁵⁹ MegaPath “is one of the largest facilities-based providers of managed services in the United States providing voice, data, and security services to enterprise and SMB customers.”⁶⁰ Serving over 235 metro markets throughout the U.S., MegaPath offers Internet connectivity via DSL, T1, Bonded T1, high-speed Ethernet, and cable.⁶¹ Its Ethernet services range from 2 Mbps to 45 Mbps symmetrical bandwidth.⁶²

⁵⁰ Level 3, Press Release, *Level 3 Completes Acquisition of Global Crossing*, (Oct. 4, 2011), available at <http://www.level3.com/en/products-and-services/data-and-internet/rural-access-solutions/tower-access>; <http://level3.mediaroom.com/index.php?s=23600&item=66513>.

⁵¹ Lighttower website, available at <http://www.lighttower.com/>.

⁵² Lighttower website, available at <http://www.lighttower.com/network/>.

⁵³ Lighttower website, available at <http://www.lighttower.com/products/>.

⁵⁴ Lumos website, available at <http://lumosnetworks.com/content/aboutus>.

⁵⁵ Lumos website, available at <http://lumosnetworks.com/content/business>.

⁵⁶ Masergy website, available at <http://www.masergy.com/about-us>.

⁵⁷ Masergy press release, *Masergy Launches Marketplace to Expand Clients' Choices for Customized Solutions* (Sept. 8, 2011), available at http://www.masergy.com/sites/default/files/news-items/MasergyLaunchesMarketplace_0.pdf.

⁵⁸ Masergy website, available at <http://www.masergy.com/solutions/intelligent-transport>.

⁵⁹ MegaPath website, available at <http://www.megapath.com/about/company/>.

⁶⁰ MegaPath website, available at <http://www.megapath.com/about/network/>.

⁶¹ MegaPath website, available at <http://www.megapath.com/about/network/>.

⁶² MegaPath website, available at <http://www.megapath.com/data/ethernet/>.

NTS. NTS Communications provides integrated voice, data and video solutions in the southwestern U.S., with core markets in Texas, Louisiana and Mississippi.⁶³ Its service offerings include private line, Ethernet over Copper and MPLS.⁶⁴

NTT America. NTT America is a subsidiary of NTT Communications, the international and long distance arm of Nippon Telegraph and Telephone Corporation.⁶⁵ It is “a leading provider of end-to-end network & IT solutions for multinational corporations,” with a “comprehensive service portfolio inclusive of Managed Network, Global IP Network and Data Center Services capability.”⁶⁶

Optimum Lightpath. Optimum Lightpath, a division of Cablevision Systems Corporation, “is an industry leader in providing advanced Ethernet-based data, Internet, voice, video transport solutions and managed services to businesses across the New York metropolitan area.”⁶⁷ Its Metro Ethernet services offer speeds from 10 Mbps to 10 Gbps.⁶⁸

Sidera Networks. Sidera Networks, a successor to RCN offers a comprehensive suite of facilities-based services including Ethernet, SONET, Wavelength and Dark Fiber.⁶⁹ Sidera operates in 12 metropolitan markets in the Northeast and Mid-Atlantic U.S.⁷⁰

Southern Light. Southern Light is “a leading provider of fiber optic-based communications solutions along the Gulf Coast.”⁷¹ It has over 2,000 route miles of high-count fiber networks and over 2,200 facilities on-net as of 2010. It serves three primary customer groups – telecommunications carriers, enterprises and government entities. Southern Light offers a “[f]ull array of traditional TDM services from DS-1 to OC-192 as well as Ethernet services from 1 Mbps to 10 Gbps.”⁷²

Sprint. Sprint offers a comprehensive range of wireless and wireline communications services.⁷³ Sprint’s business services include Global MPLS, Frame Relay, Dedicated Internet and Ethernet Access.⁷⁴ In September 2011, Sprint announced that it would extend its Ethernet coverage to 65

⁶³ NTS website, available at <http://www.ntscom.com/index.php/about/>.

⁶⁴ NTS website, available at <http://www.ntscom.com/index.php/about/>.

⁶⁵ NTT America website, available at <http://www.us.ntt.com/en/about-us.html>.

⁶⁶ NTT America website, available at <http://www.us.ntt.com/en/products-services.html>.

⁶⁷ Optimum Lightpath website, available at <http://www.optimumlightpath.com/web/guest/about-us>.

⁶⁸ Optimum Lightpath website, available at <http://www.optimumlightpath.com/web/guest/data>.

⁶⁹ Sidera Networks website, available at <http://www.sidera.net/company/corporate-facts>.

⁷⁰ http://www.sidera.net/sites/default/files/documents/Corporate_Fact_Sheet.pdf.

⁷¹ Southern Light website, available at <http://www.southernlightfiber.com/about.asp>.

⁷² Southern Light website, available at <http://www.southernlightfiber.com/about.asp>.

⁷³ Sprint website, available at <http://www.sprint.com/about/>.

⁷⁴ Sprint website, available at <http://convergence.sprint.com/convergenceconnectivity.aspx>.

markets by the end of 2011, with speeds ranging from 2 Mbps to 10 Gbps.⁷⁵ “Sprint, saw the advantages of IP early on and built an IP network on top of [its] ATM infrastructure” that it can use to provide Ethernet-based services.⁷⁶ Sprint has “actively invested in EoC to Ethernet enable more customer locations.”⁷⁷

Suddenlink. Suddenlink Communications offers various business services, including Ethernet, Business Internet, Dedicated Internet and Managed VPN.⁷⁸ Suddenlink has invested over a billion dollars to enhance its nationwide network.⁷⁹

TelePacific. Mpower Communications, d/b/a TelePacific Communications, is “one of the leading phone service providers in California and Nevada,” where it focuses on serving small and medium business.⁸⁰ It is “the largest [CLEC] competitor to AT&T, Verizon and CenturyLink in [its] major network areas.”⁸¹ Among its service offerings, TelePacific provides Ethernet from 1 Mbps to 1 Gbps.⁸²

tw telecom. tw telecom services markets nationwide over its own facilities, with more than 27,000 route miles of fiber and more than 14,300 “on-net” commercial buildings.⁸³ It specializes in “serving data-intensive businesses where connecting and communicating is critical,” such as education, financial services, government, healthcare, legal services and advanced technology companies.⁸⁴ tw telecom is “one of the three largest Business Ethernet providers in the U.S.”⁸⁵ Its Ethernet metro and nationwide services range from 2 Mbps to 10 Gbps.⁸⁶ According to tw telecom’s CEO, the company is “selling Ethernet services to telecommunications carriers in

⁷⁵ Sprint, News Release, *Sprint Continues Nationwide Ethernet Access Expansion for Businesses*, Press Release (Sept. 7, 2011), available at http://convergence.sprint.com/pdf_view.aspx?title=Sprint%20Continues%20Nationwide%20Ethernet%20Access%20Expansion&pdf=/downloads/ethernet%20release%209-7-11%20final.pdf.

⁷⁶ Insight Research Corporation, *Carriers and Ethernet Services: Public Ethernet in Metro & Wide Area Networks 2011-2016* at 31 (Aug. 2011).

⁷⁷ Frost & Sullivan, *Retail Carrier Ethernet Services Market Update, 2011, Revenue Growth Continues even as Competition Heats Up!*, N99A-63, N99A-63, at 29 (Aug. 2011).

⁷⁸ Suddenlink website, available at <https://www.suddenlinkbusiness.com/servicesproducts/pages/default.aspx>.

⁷⁹ Suddenlink website, available at <https://www.suddenlinkbusiness.com/servicesproducts/Pages/Ethernet.aspx>.

⁸⁰ Telepacific website, available at <http://www.telepacific.com/about/phone-service-providers.asp>.

⁸¹ Telepacific website, available at <http://www.telepacific.com/about/phone-service-providers.asp>.

⁸² Telepacific website, available at <http://www.telepacific.com/offer/data-network/ethernet.asp>.

⁸³ tw telecom website, available at <http://www.twtelecom.com/about-us/history/>.

⁸⁴ tw telecom website, available at <http://www.twtelecom.com/telecom-solutions/business-communications-services/>.

⁸⁵ tw telecom website, available at <http://www.twtelecom.com/why-tw/>.

⁸⁶ tw telecom website, available at <http://www.twtelecom.com/telecom-solutions/voice-solutions/business-ethernet-services/>.

general,” and, for some wireless providers, is a “preferred provider for these Ethernet networks.”⁸⁷ In 2011, “demand for [tw telecom’s] IP VPN and Ethernet services continued to drive new revenue for both enterprise and carrier customers, demonstrated by [its] 30% year-to-date growth in the strategic product revenue.”⁸⁸

Time Warner Cable. Time Warner Cable is among the largest providers of video, high-speed data and phone services in the U.S., with 14 million customers in 29 states. Time Warner Cable Business Class “offers data, video and phone services to businesses of all sizes, cell tower backhaul services to wireless carriers, and through its NaviSite subsidiary, enterprise-class hosting, managed application, messaging and cloud services.”⁸⁹ Time Warner Cable’s Ethernet products include Ethernet Private Line, Ethernet Virtual Private Line and Ethernet Local Area Network, with speeds up to 10 Gbps.⁹⁰ It also offers solutions by industry.⁹¹

Verizon. Verizon is “a global leader in delivering innovative communications, information and entertainment.”⁹² Verizon delivers “a broad range of strategic solutions, services and expertise to many of the world’s largest organizations – including 96 percent of the Fortune 1000 – and governments.”⁹³ Verizon has a nationwide presence in wireline and wireless markets, with large-business and government customers worldwide.⁹⁴

Windstream. Windstream is a leading provider of advanced network communications, including cloud computing and managed services, to businesses nationwide,⁹⁵ particularly following its recent acquisition of Paetec. Windstream serves more than 450,000 businesses with more than 100,000 miles of fiber across North America, in major cities and small towns.⁹⁶ It currently provides service in 23 states.⁹⁷ Windstream’s Ethernet Internet service offers speeds up to 1

⁸⁷ Q1 2011 TW Telecom Inc Earnings Conference Call – Final, FD (Fair Disclosure) Wire, Transcript 051111a3993007.707 (May 11, 2011) (statement by tw telecom Chairman, CEO and President Larissa Herda).

⁸⁸ Q2 2011 tw telecom Inc. Earnings Conference Call – Final, FD (Fair Disclosure) Wire, Transcript 080911a4167350.750 (Aug. 9, 2011) (statement by tw telecom Chairman, CEO and President Larissa Herda).

⁸⁹ Time Warner Cable website, available at

<http://www.timewarnercable.com/Corporate/about/highlights/>.

⁹⁰ Time Warner Cable website, available at <http://www.twcbc.com/West/Products/Ethernet/>.

⁹¹ Time Warner Cable website, available at

<http://www.twcbc.com/West/BusinessSolutions/default.ashx>.

⁹² Verizon website, available at <http://www22.verizon.com/about/>.

⁹³ Verizon website, available at <http://www22.verizon.com/about/productsandservices/>.

⁹⁴ Verizon website, available at <http://www22.verizon.com/investor/corporatehistory.htm>.

⁹⁵ Windstream website, available at <http://www.windstream.com/company/windstream-overview.html>.

⁹⁶ Windstream website, available at <http://www.windstreambusiness.com/blog/2011/12/paetec-windstream-merger>.

⁹⁷ Windstream website, available at <http://www.windstream.com/company/coverage.html>.

Gbps.⁹⁸ It also offers other private line, frame relay and VPN services.⁹⁹ “The company also offers broadband, phone and digital TV services to consumers primarily in rural areas.” Windstream provides “service for approximately 3.3 million access lines in 29 states.”¹⁰⁰ Windstream operates “an extensive local and long-haul network, including 60,000 route miles of fiber, used to deliver voice and data traffic of Windstream, as well as other carriers on a wholesale basis.” Windstream provides HSI with speeds up to 24Mbps download and 4Mbps upload speeds for Small Business Customers¹⁰¹ and Ethernet Internet Access for Enterprise Customers with speeds up to 1 Gbps.¹⁰²

XO. XO Communications operates a nationwide multi-terabit network, with approximately one million miles of metro fiber, a 19,000-route nationwide inter-city fiber network. Its network services include MPLS IP VPN, Ethernet and Wavelength services. For Ethernet, it offers a “full range of bandwidth & access options to reach more locations.”¹⁰³

Zayo. Zayo is a provider of high bandwidth infrastructure in over 60 markets, with 25,000 fiber route miles and 2,100 cellular towers on-net. It serves both carrier and non-carrier enterprise customers.¹⁰⁴ Zayo’s Ethernet offering “is designed as a carrier grade transport alternative for traditional TDM, SONET, ATM and Frame Relay networks,” with Metro E-LAN, Metro E-Line and Regional E-Line varieties to meet customers’ networking needs. It also offers fiber optical service with bandwidths ranging from Fast Ethernet to 10 Gigabit Ethernet.¹⁰⁵

⁹⁸ Windstream website, available at <http://www.windstreambusiness.com/enterprise/internet-access/ethernet-internet>.

⁹⁹ Windstream website, available at <http://www.windstreambusiness.com/enterprise/data-solutions>.

¹⁰⁰ Windstream website, available at <http://www.windstream.com/company/windstream-overview.html>.

¹⁰¹ Windstream website, available at <http://www.windstreambusiness.com/small-business/internet>.

¹⁰² Windstream website, available at <http://www.windstreambusiness.com/enterprise/internet-access/ethernet-internet>.

¹⁰³ XO website, available at <http://www.xo.com>; <http://www.xo.com/services/network/ethernet/Pages/overview.aspx>.

¹⁰⁴ Zayo website, available at <http://www.zayo.com/network-statistics>.

¹⁰⁵ Zayo website, available at <http://www.zayo.com/ethernet-services>.

Attachment F

Attachment F

DECLARATION OF RYAN SCHWERTNER

1. My name is Ryan Schwertner. My business address is 931 14th Street, Denver, CO 80202. I am employed as a Director of Business Marketing at CenturyLink. In that capacity, I have segment marketing and strategic pricing oversight for the RMG Business SMB and Mid-Large Business customer segments. I have been employed by CenturyLink and its predecessor companies for 9 years, holding positions in various pricing, finance and operations roles.
2. The purpose of my declaration is to discuss the ways in which CLECs are using copper loops purchased as unbundled network elements (UNEs) to provide Ethernet and other enterprise broadband services. Through use of “pair bonding,” CLECs can provide broadband speeds and performance that are comparable to those of CenturyLink’s enterprise broadband services – at a fraction of the cost of deploying fiber. Integra Telecom and other CLECs are using this strategy with great success to win small, medium and large business customers in CenturyLink’s service territory.
3. Over the past 12 to 18 months, CLECs have successfully launched and marketed “Ethernet-Over-Copper” services in numerous areas served by CenturyLink. These areas include large metropolitan statistical areas (MSAs), such as Las Vegas, Phoenix and Seattle, but also “Tier 2” and “Tier 3” cities, such as Boise, ID, Fargo, ND, Medford, OR and Billings, MT (just to name a few examples).
4. Integra Telecom is one of the most successful providers of these services. Integra uses Ethernet-Over-Copper technology to provide a package of voice, data and Internet services with up to 30 Mbps of symmetrical upstream and downstream bandwidth.

Integra markets this Ethernet service primarily to small and medium businesses as a cost-effective, scalable alternative to the enterprise broadband services provided by ILECs and cable companies. Integra currently delivers Ethernet-Over-Copper service to more than 120 central offices throughout its eleven-state footprint in the western U.S.

5. Integra and other CLECs typically provide such services by bonding up to eight copper UNE loops purchased from an ILEC such as CenturyLink. Through use of DSL-based technologies, the CLEC is able to provide broadband speeds and performance over the ILEC's existing copper infrastructure that rival those of fiber-based broadband services, without the construction costs required for new fiber optic installation. The CLEC's cost structure is further reduced by the fact that it can purchase the copper loops at TELRIC rates.
6. Integra has used this cost advantage to offer very competitive rates and gain large numbers of business customers in areas served by CenturyLink. On average in Phoenix, Minneapolis, Seattle, Denver and Portland, for example, Integra's revenues for data services provided to "mid-market" customers exceed those of any other provider, including CenturyLink. But these services are not limited to the largest metropolitan areas served by CenturyLink. Integra has also deployed Ethernet-Over-Copper services to smaller metropolitan areas including Idaho Falls, Fargo, ND and Salem, OR.
7. Other CLEC providers of Ethernet-Over-Copper services include EarthLink Business, CBeyond, MegaPath, Paetec and XO.

/s/ Ryan Schwertner
Ryan Schwertner

February 23, 2012

Attachment G

REDACTED – FOR PUBLIC INSPECTION

(Highly Confidential Document Omitted in Its Entirety)

Attachment H

REDACTED – FOR PUBLIC INSPECTION

(Highly Confidential Document Omitted in Its Entirety)

Attachment I

REDACTED – FOR PUBLIC INSPECTION

(Highly Confidential Document Omitted in Its Entirety)

Attachment J

REDACTED – FOR PUBLIC INSPECTION

(Highly Confidential Document Omitted in Its Entirety)

Attachment K

REDACTED – FOR PUBLIC INSPECTION

(Highly Confidential Document Omitted in Its Entirety)

Attachment L

REDACTED – FOR PUBLIC INSPECTION

(Highly Confidential Document Omitted in Its Entirety)

CERTIFICATE OF SERVICE

I, Daniel H. Kahn, do hereby certify that I have caused the foregoing

1) **CENTURYLINK PETITION FOR FORBEARANCE (HIGHLY CONFIDENTIAL -- NOT FOR PUBLIC INSPECTION -- COPYING PROHIBITED)** to be: (a) filed, via courier, with the Office of the Secretary of the FCC (original and an extra copy to be stamped and returned); and (b) served (three copies), via courier, on Ms. Lisa Gelb of the FCC's Wireline Competition Bureau; and the 2) **CENTURYLINK PETITION FOR FORBEARANCE (REDACTED -- FOR PUBLIC INSPECTION)** to be: (a) filed, via courier, with the Office of the Secretary of the FCC (original and four copies, and an extra copy to be stamped and returned); (b) served (three copies), via courier, on Ms. Lisa Gelb of the FCC's Wireline Competition Bureau; (c) transmitted via e-mail to forbearance@fcc.gov; and (d) served via e-mail on the FCC's contractor, Best Copy and Printing, Inc. at fcc@bcpiweb.com.

/s/ Daniel H. Kahn

February 23, 2012